

PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Union Tank Car Company - Plant 1
151st Street and Railroad Avenue
East Chicago, Indiana 46312**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T089-7732-00332	
Issued by: Original signed by Janet McCabe Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: March 31, 2003 Expiration Date: March 31, 2008

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates stationary steel railroad car manufacturing plant.

Responsible Official:	Louis A. Kulekowskis
Source Address:	151 st Street and Railroad Avenue, East Chicago, IN 46312
Mailing Address:	151 st Street and Railroad Avenue, East Chicago, IN 46312
General Source Phone Number:	(219) 392-1500
SIC Code:	3743
County Location:	Lake
County Status:	Non-attainment for ozone, PM ₁₀ , and sulfur dioxide Maintenance Attainment for carbon monoxide
Source Status:	Part 70 Permit Program Major, under Emission Offset Rules; Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) three (3) surface coating booths, identified as P-SC-01 (and 3a, 3b, and 3c), utilizing air assisted airless method of spraying and with a maximum capacity of 80 pounds of paint per hour and 0.75 steel tank cars per hour, using dry filters for over spray control, with three (3) natural gas drying room heaters with capacities of 3.45 each, and exhausting to two (2) exhaust ducts, ID 3:a1 and 3:a2, (constructed in 1978, replaced in 1997),
- (b) one (1) grit blast, identified as P-PB-01, located in building #7, with a maximum design rate of 14.4 tons per hour, using two dust collectors as control, and exhausting to two ducts (constructed in 1969),
- (c) one (1) rotoblast, identified as P-PB-02, located in building #7, with a maximum design rate of 120 pounds per hour, using two (2) dust collectors as control, and each exhausting to individual stacks (constructed in 1968 and replaced in 1994),
- (d) two (2) natural gas stress furnaces, P-CB-02 and P-CB-03, with a maximum capacity of 55 MM Btu/hr and 64.6 MM Btu/hr, and exhausting through stacks, ID 5b and 5a, respectively, P-CB-02, (constructed in 1969), and P-CB-03, (constructed in 1969 and modified in 1993),
- (e) two (2) grit blast operations located in building #8, designated as P-PB-03 and P-PB-04, each operation with a baghouse for control, (constructed in 1989 and modified in 1995), and
- (f) one (1) steel grit abrasive blast system, P-PB-04, with a design rate of 7519.8 pounds per hour, using a baghouse as control, and exhausted to emission point 19, (constructed in 1989),
- (g) welding operations, P-WD-01, (constructed in 1989):
 - (1) metal inert gas (MIG) welders with welding rod usage of 270.98 pounds

per hour,

- (2) submerged arc welding with welding rod usage of 484.2 pounds per hour, and
- (3) stick welding with stick usage of 89.1 pounds per hour.
- (h) The paint application room, located in building #8 which consists of building # 8 paint booth designated as P-SC-02, adhesive application designated as P-SC-03, stencil shop designated as P-SC-04, building #8 jacket prime designated as P-SC-05, and coatings development lab designated as P-SC-06.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour, specified as follows:
 - (1) one (1) boiler, No. 4, with a maximum capacity of 6.28 MM Btu/hr, subject to 326 IAC 6-1-2,
 - (2) one (1) boiler, No. 8, with a maximum capacity 2.06 MM Btu/hr, subject to 326 IAC 6-1-2,
 - (3) one (1) boiler, P-CB-08, subject to 326 IAC 6-1-2,
 - (4) two (2) boilers, subject to 326 IAC 6-1-2, and nine (9) space heaters, P-CB-16 through P-CB-24,
- (b) degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, subject to 326 IAC 8-3-5 and 326 IAC 8-3-2.
- (c) grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow less than 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations: (Z-bar blast, P-PB-05, small parts blast, P-PB-06), subject to 326 IAC 6-1.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B

GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.3 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.

(c) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provision of this permit is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) Noncompliance with any provisions of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.
- (c) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (d) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document

is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP extension notification does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5)

years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.12 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and Northwest Regional Office (NRO) within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or

Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

NRO Telephone Number: 219-881-6712

NRO Facsimile Number: 219-881-6745

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the

certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) In addition to the nonapplicability determinations set forth in Sections D of this permit, the IDEM, OAQ has made the following determinations regarding this source:
 - (1) The requirement from 326 IAC 6-1-10.1 PM10 Emission Limitations for Lake County has been specified in the permit. IDEM, OAQ has submitted a revision request to EPA so that the SIP is being revised to include a revised limit. The allowable PM10 emission limit of 0.002 lbs/ton and 0.02 lb/hr is not achievable or reasonable given the particulate matter control technology of today nor when the SIP limit was developed. Therefore, the company has requested a revision to the SIP and has proposed the allowable PM10 emission limit of 0.01 grains per actual cubic feet per minute. EPA has reviewed supporting air modeling data and calculations, and found that this change will not impact ambient air quality in Lake County. Therefore, this revised limit shall be incorporated into the draft Title V operation permit, but shall only issue the permit when the SIP revision is finally

adopted.

- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and ~~de~~ does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality

100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
 - (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]

If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the

change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy any records that must be kept under the conditions of this permit;
- (c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 4230(ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P][326 IAC 6-3-2]

- (a) Pursuant to 40 CFR 52 Subpart P, the allowable particulate emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate emissions rate from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour. This condition is not federally enforceable.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of twenty percent (20%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Fugitive Dust Emissions [326 IAC 6-1-11.1]

Pursuant to 326 IAC 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements), the particulate matter emissions from source wide activities shall meet the following requirements:

- (a) The average instantaneous opacity of fugitive particulate emissions from a paved road shall not exceed ten percent (10%).
- (b) The average instantaneous opacity of fugitive particulate emissions from an unpaved road shall not exceed ten percent (10%).
- (c) The average instantaneous opacity of fugitive particulate emissions from batch transfer shall not exceed ten percent (10%).

- (d) The opacity of fugitive particulate emissions from continuous transfer of material onto and out of storage piles shall not exceed ten percent (10%) on a three (3) minute average.
- (e) The opacity of fugitive particulate emissions from storage piles shall not exceed ten percent (10%) on a six (6) minute average.
- (f) There shall be a zero (0) percent frequency of visible emission observations of a material during the inplant transportation of material by truck or rail at any time.
- (g) The opacity of fugitive particulate emissions from the inplant transportation of material by front end loaders and skip hoists shall not exceed ten percent (10%).
- (h) There shall be a zero (0) percent frequency of visible emission observations from a building enclosing all or part of the material processing equipment, except from a vent in the building.
- (i) The PM_{10} emissions from building vents shall not exceed twenty-two thousandths (0.022) grains per dry standard cubic foot and ten percent (10%) opacity.
- (j) The opacity of particulate emissions from dust handling equipment shall not exceed ten percent (10%).
- (k) Any facility or operation not specified in 326 IAC 6-1-11.1(d) shall meet a twenty percent (20%), three (3) minute average opacity standard.

The Permittee shall achieve these limits by controlling fugitive particulate matter emissions according to the Fugitive Dust Control Plan.

C.7 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.8 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.

C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;

- (B) Removal or demolition contractor; or
- (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square-feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.10 Performance Testing [326 IAC 3-6]

-
- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days

prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.11 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA..

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.12 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.13 Maintenance of Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less often than once an hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.14 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.15 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

- (b) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (b) Whenever a condition in this permit requires the measurement of a flow rate the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.16 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.17 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP).

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.18 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.
- (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
- (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
- (b) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
- (c) Failure to take reasonable response steps shall constitute a violation of the permit.

- (c) The Permittee is not required to take any further response steps for any of the following reasons:

- (1) A false reading occurs due to the malfunction of the monitoring equipment and

prompt action was taken to correct the monitoring equipment.

- (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
- (3) An automatic measurement was taken when the process was not operating.
- (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

**C.19 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

**C.20 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]
[326 IAC 2-6]**

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

- (1) Indicate estimated actual emissions of criteria pollutants from the source, in

compliance with 326 IAC 2-6 (Emission Reporting);

- (2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:
- Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.21 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.22 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.23 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

Three (3) surface coating booths, identified as P-SC-01 (and 3a, 3b, and 3c), utilizing air assisted airless method of spraying and with a maximum capacity of 80 pounds of paint per hour and 0.75 steel tank cars per hour, using dry filters for over spray control, with three (3) natural gas drying room heaters with capacities of 3.45 each, and exhausting to two (2) exhaust ducts, ID 3:a1 and 3:a2, (constructed in 1978, replaced in 1997)

The paint application room, located in building #8 which consists of building # 8 paint booth designated as P-SC-02, adhesive application designated as P-SC-03, stencil shop designated as P-SC-04, building #8 jacket prime designated as P-SC-05, and coatings development lab designated as P-SC-06

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of extreme performance coatings applied to steel tank cars shall be limited to 3.5 pounds of VOC/gallon of coating less water delivered to the applicator.
- (b) Solvent sprayed from the application equipment during clean up or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.1.2 Emission Offset Limit [326 IAC 2-3]

- (a) Pursuant to CP089-7082-00332 issued on October 24, 1997 and revised through this Part 70 Operating permit, the VOC input from the entire source shall be less than 125.4 tons of VOC per 12 consecutive month period where compliance is determined at the end of each month. This usage limit is required to limit the potential to emit of VOC to less than 100 tons per 12 consecutive month period. Compliance with this limit ensures that 326 IAC 2-3 (Emission Offset) is not applicable.
- (b) Pursuant to CP089-2369-00332, issued March 29, 1995 and revised through this Part 70 Operating permit, the input to the paint application room including clean-up solvents minus the amount disposed of off-site shall be limited to 24.5 tons per twelve (12) consecutive month period where compliance is determined at the end of each month. This usage limit is required to limit the potential to emit of VOC to less than 25 tons per 12 consecutive month period. Compliance with this limit ensures that 326 IAC 2-3 (Emission Offset) is not applicable.

D.1.3 Hazardous Air Pollutant (HAP) Limit [326 IAC 2-4.1][40 CFR Part 63.50][326 IAC 20-1]

Pursuant to CP089-7082 issued on October 24, 1997, the HAP input from the three (3) paint booths (identified as P-SC-01) combined shall be less than 10 tons of a single HAP per 12 consecutive month period, and less than 25 tons of a combination of HAPs per 12 consecutive month period where compliance is determined at the end of each month. These usage limits are required to limit the potential to emit of a single HAP to less than 10 tons per 12 consecutive month period and a combination HAPs to less than 25 tons per 12 consecutive months period. Compliance with these limits ensure that 326 IAC 2-4.1 (New Source Toxics Control Rule) and 40 CFR part 63.50 (112(j) of the Clean Air Act (CAA)) are not applicable.

D.1.4 Particulate Matter (PM) Limit [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2, the allowable particulate emissions for the spray coating operations

designated as P-SC-01, the building # 8 paint booth application room, shall not exceed 0.03 grains per dry standard cubic feet of air per minute.

D.1.5 Preventive Maintenance Plan [326 IAC 2-7-4(c)(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.6 Volatile Organic Compounds (VOC)[326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) and 326 IAC 8-1-2(a)(7) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.7 VOC Emissions

Compliance with Condition D.1.2 and D.1.3 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) consecutive month period.

D.1.8 Hazardous Air Pollutants (HAPs)

Compliance with the HAP usage limitations in Condition D.1.3 shall be determined by one of the following:

- (a) The manufacturer's certified product data sheet.
- (b) The manufacturer's material safety data sheet.
- (c) An alternate method approved by IDEM, OAQ.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.9 Particulate Matter (PM)

The dry filters for PM control shall be in place at all times when any one of the three (3) paint booths, P-SC-01 (3a, 3b, or 3c), and the building # 8 paint application room, are in operation.

D.1.10 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks, S-SC-01 and the paint application room stack(s), while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.11 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1, D.1.2, and D.1.3, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC and HAP emission limits established in Condition D.1.1, D.1.2, and D.1.3.
 - (1) The VOC and HAP, of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on daily basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (3) The volume weighted VOC and HAP content of the coatings used for each month;
 - (4) The cleanup solvent usage for each month;
 - (5) The total VOC and HAP usage for each month; and
 - (6) The weight of VOCs and HAPs emitted for each compliance period.
- (b) To document compliance with Condition D.1.10, the Permittee shall maintain a log of weekly over spray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.12 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.2 and D.1.3 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the period being reported.

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

One (1) grit blast, identified as P-PB-01, located in building #7, with a maximum design rate of 14.4 tons per hour, using two dust collectors as control, and exhausting to two exhaust ducts, and

One (1) rotoblast, identified as P-PB-02, located in building #7, with a maximum design rate of 120 pounds per hour, using two (2) dust collectors as control, and each exhausting to individual stacks.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 PM and PM10 Emission Limitations for Lake County [326 IAC 6-1-10.1]

Pursuant to 326 IAC 6-1-10.1, approved by the EPA on January 21, 2003, the allowable PM emission rate from the grit blast and rotoblast operation, identified as P-PB-01 and P-PB-02, shall not exceed the allowable PM10 emission limit of 0.01 grains per dry standard cubic feet per minute which equates to 9.90 pounds per hour.

D.2.2 Preventive Maintenance Plan [326 IAC 2-7-4(c)(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.2.3 Testing Requirements [326 IAC 2-7-6(1)]

During the period between 30 and 36 months after issuance of this permit, the Permittee shall perform PM and PM-10 testing on the grit blast and rotoblast operation utilizing Methods 5 or 7 (40 CFR 60, Appendix A) for PM and Methods 201 or 201A and 202 (40 CFR 51, Appendix M) for PM-10, or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM-10 includes filterable and condensable PM-10.

D.2.4 Particulate Matter (PM) [326 IAC 6-1-10.1]

The dust collector for PM control shall be in operation at all times when the grit blast, P-PB-01, and rotoblast, P-PB-02, is in operation and exhausting to the outside atmosphere.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.5 Parametric Monitoring

- (a) The Permittee shall record the total static pressure drop across the dust collectors used in conjunction with the rotoblast process, at least once per shift when the rotoblast process is in operation and when venting to the atmosphere. When for any one reading, the pressure drop across the dust collectors is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable steps in accordance with Section C-Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.2.6 Dust Collector Inspections

An inspection shall be performed each calendar quarter of all dust collectors controlling the blasting operations when venting to the atmosphere. A dust collector inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.

D.2.7 Dust Collector Failure

In the event that dust collector failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

D.2.8 Visible Emissions Notations

- (a) Visible emission notations of the rotoblast exhaust points shall be performed once per shift during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.9 Record Keeping Requirements

- (a) To document compliance with Condition D.2.5, the Permittee shall maintain the following:
 - (1) records of the inlet and outlet differential static pressure during normal operation when venting to the atmosphere.
- (b) To document compliance with Condition D.2.6, the Permittee shall maintain records of the results of the inspections required under Condition D.2.6.
- (c) To document compliance with Condition D.2.8, the Permittee shall maintain records of visible emission notations of the rotoblast operation.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

Two (2) natural gas stress furnaces, P-CB-02 and P-CB-03, one with a maximum capacity of 55 MM Btu/hr and one with a maximum capacity of 64.6 MM Btu/hr, and exhausting through stacks, ID 5b and 5a, respectively.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Emissions Limitations [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2, the allowable particulate emissions for the two (2) natural gas stress furnaces, P-CB-02 and P-CB-03, shall not exceed 0.03 grains per dry standard cubic feet of air per minute.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.2 Compliance Monitoring Requirements

There are no compliance monitoring requirements applicable to these furnaces because they combust natural gas only.

SECTION D.4

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

Two (2) grit blast operations located in building #8, designated as P-PB-03 and P-PB-04, each operation with a baghouse for control

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 PM and PM10 Emission Limitations for Lake County [326 IAC 2-3][40 CFR 52.21][326 IAC 2-2]

Pursuant to CP 089-2369, issued March 29, 1995, and 326 IAC 2-3, PM10 and PM allowable emissions for two (2) grit blast rooms, P-PB-03 and P-PB-04, shall not exceed 15 tons of PM10 and 25 tons of PM per 12 consecutive month period combined, where compliance is determined at the end of each month, so that the requirements of 326 IAC 2-3 (Emission Offset), 326 IAC 2-2 and 40 CFR 52.21, do not apply. Compliance with the PM emission limitations based on 326 IAC 6-1-2 of 0.03 grains per dry standard cubic foot is adequate to show compliance with this emission limitation.

D.4.2 PM Emission Limitations for Lake County [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2, the allowable particulate emissions for blasting, P-PB-03 or P-PB-04, shall not exceed 0.03 grains per dry standard cubic feet of air per minute.

D.4.3 Preventive Maintenance Plan [326 IAC 2-7-4(c)(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.4.4 Testing Requirements [326 IAC 2-7-6(1)]

During the period between 30 and 36 months after issuance of this permit, the Permittee shall perform PM and PM-10 testing for the two (2) grit blast operations (P-PB-03 and P-PB-04) utilizing Methods 5 or 7 (40 CFR 60, Appendix A) for PM and Methods 201 or 201A and 202 (40 CFR 51, Appendix M) for PM-10, or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM-10 includes filterable and condensable PM-10.

D.4.5 Particulate Matter (PM) [326 IAC 2-3] [326 IAC 6-1-2]

The baghouse for PM control shall be in operation at all times when the grit blasting, P-PB-03 and P-PB-04, is in operation and exhausting to the outside atmosphere.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.4.6 Visible Emissions Notations

- (a) Visible emission notations of the two (2) grit blast operations stack exhausts shall be performed once per shift during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

- (e) The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

D.4.7 Parametric Monitoring

- (a) The Permittee shall record the total static pressure drop across the baghouses used in conjunction with the blasting processes, at least once per shift when the blasting processes are in operation and when venting to the atmosphere. When for any one reading, the pressure drop across the baghouses is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable steps in accordance with Section C-Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.4.8 Baghouse Inspections

An inspection shall be performed each calendar quarter of all baghouses controlling the blasting operations when venting to the atmosphere. A dust collector inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.

D.4.9 Baghouse Failure

In the event that dust collector failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.10 Record Keeping Requirements

- (a) To document compliance with Conditions D.4.1 and D.4.2, the Permittee shall maintain records of visible emission notations of the grit blast rooms' stack exhaust as required by Condition D.4.6.
- (b) To document compliance with Conditions D.4.1, D.4.2, and D.4.7, the Permittee shall maintain records of the inlet and outlet differential static pressure during normal operation and when venting to the atmosphere.
- (c) To document compliance with Condition D.4.8, the Permittee shall maintain records of the results of the inspections required under Condition D.4.8.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.5

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

Welding operations, P-WD-01:

- (a) metal inert gas (MIG) welders with welding rod usage of 270.98 pounds per hour
- (b) submerged arc welding with welding rod usage of 484.2 pounds per hour, and
- (c) stick welding with stick usage of 89.1 pounds per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.5.1 PM and PM 10 Emission Limitations for Lake County [326 IAC 2-3][40 CFR Part 52.21](326 IAC 2-2]

PM10 and PM allowable emissions for welding, P-WD-01, pursuant to 326 IAC 2-3, the emissions shall not exceed 15 tons of PM10 or 25 tons of PM per 12 consecutive month period where compliance is determined at the end of each month, so that the requirements of 326 IAC 2-3 (Emission Offset), and 40 CFR 52.21 and 326 IAC 2-2, do not apply. Compliance with these emission limitations shall be determined by calculations based on usage rates and AP42 emission factors for MIG, SAW, and stick welding.

D.5.2 PM 10 Emission Limitations for Lake County [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2, the allowable particulate emissions for welding, P-WD-01, shall not exceed 0.03 grains per dry standard cubic feet of air per minute.

D.5.3 Preventive Maintenance Plan [326 IAC 2-7-4(c)(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.5.4 Record Keeping Requirements

- (a) To document compliance with Conditions D.5.1, the Permittee shall maintain records of the amount and type of welding rod and stick used.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.6

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Insignificant Activities:

Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour, specified as follows:

- (a) one (1) boiler, No. 4, with a maximum capacity of 6.28 MM Btu/hr, constructed , subject to 326 IAC 6-1-2,
- (b) one (1) boiler, No. 8, with a maximum capacity 2.06 MM Btu/hr, constructed , subject to 326 IAC 6-1-2,
- (c) one (1) boiler, P-CB-08, subject to 326 IAC 6-1-2,
- (d) two (2) boilers, subject to 326 IAC 6-1-2, and nine (9) space heaters, P-CB-16 through P-CB-24,
- (e) three (3) natural gas fired drying room heaters, and the three (3) natural gas fired catalytic infra-red heaters

Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, subject to 326 IAC 8-3-2 and 326 IAC 8-3-5.

Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow less than 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations: (Z-bar blast, P-PB-05, and small parts blast, P-PB-06), subject to 326 IAC 6-1-2.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.6.1 Particulate Matter Limit [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2, the particulate matter content of all gaseous fuel fired steam generators shall not exceed 0.01 grains per dry standard cubic foot.

D.6.2 Volatile Organic Compounds [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations) for cold cleaning operations constructed after January 1, 1980, the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.6.3 Volatile Organic Compounds [326 IAC 8-3-5]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) the solvent volatility is greater than two (2) kiloPascals (fifteen

(15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));

(B) the solvent is agitated; or

(C) the solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

State Form 47738 (5-96)

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Union Tank Car Company - Plant 1
Source Address: 151st Street and Railroad Avenue, East Chicago, IN 46312
Mailing Address: 151st Street and Railroad Avenue, East Chicago, IN 46312
Part 70 Permit No.: T089-7732-00332

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Affidavit (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Union Tank Car Company - Plant 1
Source Address: 151st Street and Railroad Avenue, East Chicago, IN 46312
Mailing Address: 151st Street and Railroad Avenue, East Chicago, IN 46312
Part 70 Permit No.: T089-7732-00332

This form consists of 2 pages

Page 1 of 2

- | | |
|---|--|
| 9 | This is an emergency as defined in 326 IAC 2-7-1(12) |
| C | The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and |
| C | The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16. |

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Union Tank Car Company
Source Address: 151st & Railroad Avenue, East Chicago, Indiana 46312
Mailing Address: 151st & Railroad Avenue, East Chicago, Indiana 46312
Construction Permit No.: CP089-7082-00332
Facility: Three (3) paint booths, identified as 3a, 3b and 3c
Parameter: VOC
Limit: 125.4 tons per year, based on a monthly rolling limit.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Union Tank Car Company
Source Address: 151st Street & Railroad Avenue, East Chicago, Indiana 46312
Mailing Address: 151st Street & Railroad Avenue, East Chicago, Indiana 46312
Title V Permit No.: T089-7732-00332
Facility: Three (3) paint booths, identified as 3a, 3b and 3c
Parameter: HAPs
Limit: 10 tons per year based on a monthly rolling average for any individual HAP and 25 tons per year based on a monthly rolling for any combination of HAPs

YEAR: _____

Month	Column 1		Column 2		Column 1 + Column 2	
	This Month		Previous 11 Months		12 Month Total	
	Single HAP	Combined HAPs	Single HAP	Combined HAPs	Single HAP	Combined HAPs
Month 1						
Month 2						
Month 3						

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Union Tank Car Company - Plant 1
Source Address: 151st Street and Railroad Avenue, East Chicago, IN 46312
Mailing Address: 151st Street and Railroad Avenue, East Chicago, IN 46312
Part 70 Permit No.: T089-7732-00332
Months: _____ to _____ Year: _____

Page 1 of 2

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management

Office of Air Quality

Addendum to the Technical Support Document for a Part 70 Operating Permit

Source Name: Union Tank Car Co. - Plant 1
Source Location: 151st Street and Railroad Avenue, East Chicago, IN 46312
County: Lake
SIC Code: 3743
Operation Permit No.: T089-7732-00332
Permit Reviewer: Nysa L. James

On November 13, 2001, the Office of Air Quality (OAQ) had a notice published in the East Chicago Public Library, 1108 West Chicago Avenue, East Chicago, Indiana 46312 and the Northwest Regional Office, NBD Bank Building, Suite 418, 504 North Broadway, Gary, Indiana 46402-1921 stating that Union Tank Car Co. - Plant 1 had applied for a Part 70 Operating Permit to operate steel railroad tank car manufacturing operation. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, the OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table Of Contents has been modified to reflect these changes.

1. The Table of Contents has been revised based on the following changes listed in this addendum.
2. Section A.1 is revised to reflect the correct attainment status of the criteria pollutants. In addition, this source is minor under Section 112 of the CAA, therefore the "Major Source" status will be revised to "Minor Source".

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates stationary steel railroad car manufacturing plant.

Responsible Official: Louis A. Kulekowskis
Source Address: 151st Street and Railroad Avenue, East Chicago, IN 46312
Mailing Address: 151st Street and Railroad Avenue, East Chicago, IN 46312
General Source Phone Number: (219) 392-1500
SIC Code: 3743
County Location: Lake
County Status: Non-attainment for ozone, ~~carbon monoxide~~, PM10, and sulfur dioxide, ~~and total suspended particulate~~.
Maintenance Attainment for carbon monoxide
Source Status: Part 70 Permit Program
Major, under Emission Offset Rules;

Major Minor Source, Section 112 of the Clean Air Act

3. Section A.3 is revised to reflect the correct rule citations for the respective facilities.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour, specified as follows:
 - (1) one (1) boiler, No. 4, with a maximum capacity of 6.28 MM Btu/hr, subject to 326 IAC ~~6-1-2 6-2-4~~,
 - (2) one (1) boiler, No. 8, with a maximum capacity 2.06 MM Btu/hr, subject to 326 IAC ~~6-1-2 6-2-4~~,
 - (3) one (1) boiler, P-CB-08, subject to 326 IAC ~~6-1-2 6-2-4~~,
 - (4) two (2) boilers, subject to 326 IAC ~~6-1-2 6-2-4~~, and nine (9) space heaters, P-CB-16 through P-CB-24,
- (b) degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, subject to 326 IAC 8-3-5 and 326 IAC 8-3-2.
- (c) grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow less than 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations: (Z-bar blast, P-PB-05, small parts blast, P-PB-06), subject to 326 IAC 6-1.
- (d) Other categories with emissions below insignificant thresholds:
surface coating operations with potential VOC (non-HAP) emissions less than 3 pounds per hour and 15 pounds per day, (building # 8 paint booth, P-SC-02, adhesive application, P-SC-03, stencil shop, P-SC-04, building #8 jacket prime, P-SC-05, coatings development lab, P-SC-06), subject to 326 IAC 6-1.

4. A new rule cite has been added to Condition B.2, Permit Term, to more accurately reflect the derivation of the condition. In order to avoid confusion for renewals as to what "original" date the permit is referring to the following change has been made:

B.2 Permit Term [326 IAC 2-7-5(2)] **[326 IAC 2-1.1-9.5]**

This permit is issued for a fixed term of five (5) years from the ~~original issuance~~ **date of this permit**, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

5. Since B.7 (c) Duty to Supplement and Provide Information already addresses confidentiality, the last sentence of (b) was revised to remove the statement about confidential information, and (c) was updated for clarity.

B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]
[326 IAC 2-7-6(6)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit. ~~or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]~~
- (c) **For information furnished by the Permittee to IDEM, OAQ,** the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

6. B.11 Preventive Maintenance Plan has been revised because it is not necessary to state twice that the PMP does not need to be certified. Since it is more appropriate to state in (c), it has been removed from (a).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee’s control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP ~~and the PMP~~ extension notification **does** not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

7. B.12 Emergency Provisions (a)(b) and (g) have been revised to reflect rule changes to 326 IAC 2-7-16. This section of the rule is now consistent with 40 CFR 70.6(g) and provides an affirmative defense to an action brought for non-compliance with technology based emission limitations only. In addition, the requirement to include emergencies in the Quarterly Deviation and Compliance Monitoring Report has been moved from B.15 to B.12.

B.12 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, ~~except as provided in 326 IAC 2-7-16.~~
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a ~~health-based or~~ technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (g) ~~Operations may continue during an emergency only if the following conditions are met:~~

- (1) ~~If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.~~

- (2) ~~If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:~~

- (A) ~~The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and~~

- (B) ~~Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.~~

~~Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.~~

- (h) **The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.**

8. B.14 Multiple Exceedances has been deleted, because 326 IAC 2-7-5(1)(E) has been repealed and it conflicted with 40 CFR 70.6(a)(6). B.14 Prior Permits Superseded was added to the permit to implement the intent of the new rule 326 IAC 2-1.1-9.5.

~~B.14 Multiple Exceedances [326 IAC 2-7-5(1)(E)]~~

~~Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.~~

B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

- (1) incorporated as originally stated,**
- (2) revised, or**
- (3) deleted**

by this permit.

(b) All previous registrations and permits are superseded by this permit.

9. Since B.14 Prior Permits Superseded has been added to the permit, it is not necessary for this statement to be in this condition. In addition, B.13 (h) Permit Shield has been revised to correct the rule cite.

~~B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]~~

~~(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superseded by this permit.~~

~~(h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(78)]~~

10. The IDEM, OAQ, has revised Condition B.15 Deviations from Permit Requirements and Conditions and certain Parametric Monitoring conditions in the D section of the permit to address concerns regarding the independent enforceability of permit conditions [see 40 CFR 70.6(a)(6)(i)]. The Parametric Monitoring conditions have been revised to establish normal operating conditions for the emission unit or control device and to require implementation of the compliance response plan when monitoring indicates operation is outside the normal range. In addition, the OAQ has changed the monitoring from once per week to once per shift in order to determine compliance in a continuous manner with 326 IAC 6 and 326 IAC 5. Language that inferred that operating outside of the normal range could be considered by itself to be a deviation was removed. B.15 was revised to remove language that could be considered to grant exemptions from permit requirements and to clarify reporting obligations. In addition, B.15(c) has been removed from B.15 Deviations from Permit Requirements and Conditions, then revised and incorporated in B.12 Emergency Provisions.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. ~~Deviations that are required to be reported by an applicable requirement~~ **A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit**, shall be reported according to the schedule stated in the applicable requirement and ~~do~~ does not need to be included in this report.

The ~~notification by the Permittee~~ Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit ~~or a rule. It does not include:~~

(1) ~~An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or~~

(2) ~~Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.~~

~~A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.~~

-
- (c) ~~Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring~~

D.2.5 Parametric Monitoring

- (a) The Permittee shall record the total static pressure drop across the dust collectors used in conjunction with the ~~rotoblast blasting~~ processes, at least once ~~weekly per shift~~ when the ~~rotoblast blasting~~ process is in operation **and when venting to the atmosphere**. ~~Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise~~ **When for any one reading**, the pressure drop across the ~~baghouse dust collectors~~ shall be maintained ~~within~~ **is outside** the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test. ~~The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of the above mentioned range for any one reading.~~, **the Permittee shall take reasonable steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation,**

Implementation, Records, and Reports, shall be considered a violation of this permit.

- (b) The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.4.7 Parametric Monitoring

- (a) The Permittee shall record the total static pressure drop across the baghouses used in conjunction with the blasting processes, at least once ~~weekly per shift~~ when the blasting processes ~~is are~~ in operation **and when venting to the atmosphere.** ~~Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, When for any one reading, the pressure drop across the baghouses shall be maintained within is outside the normal~~ range of 3.0 and 6.0 inches of water or a range established during the latest stack test. ~~The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of the above mentioned range for any one reading. , the Permittee shall take~~ **reasonable steps in accordance with Section C-Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.**
- (b) The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

11. In order to be consistent with 326 IAC 2-7-20(a)(4), the rule cite in B.20(a)(5) has been revised as follows:

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

12. B.21 was revised as follows:

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by **the requirements of** 326 IAC 2 and 326 IAC 2-7-10.5.

13. 326 IAC 2-1.1-7 specifies that nonpayment may result in revocation of the permit. This is not specified in 326 IAC 2-7; therefore, this rule cite is being added to B.24. Also, the section and phone number of who the Permittee can contact has been corrected in (c).

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]~~[326 IAC 2-1.1-7]~~

- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 **4230**(ask for OAQ, Technical Support and Modeling Section **I/M & Billing Section**), to determine the appropriate permit fee.

14. Condition C.1, Particulate Emission Limitations for Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour, since the public notice of this draft permit, is now a mandatory condition required in all Part 70 permits. This condition specifically requires any additional processes, at any given source, whether insignificant or not, which operate at a maximum process weight rate of less than 100 pounds per hour, to comply with the stated limit regarding particulate matter emissions. As a result, this condition is added into the proposed/final permit for this source. The Part 70 Permit program does not relieve sources from rule applicability. It should be noted however, that no reporting, or compliance monitoring, is required regarding the insignificant activities subject to this rule which operate at a maximum process weight rate of less than 100 pounds per hour. All condition following have been renumbered accordingly.

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P]~~[326 IAC 6-3-2(e)]~~

- (a) Pursuant to 40 CFR 52 Subpart P, the allowable particulate emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate emissions rate from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour. This condition is not federally enforceable.

15. Part 70 requires any application form, report, or compliance certification to be certified by the Responsible Official. IDEM, OAQ has revised C.9 Asbestos Abatement Projects to clarify that the asbestos notification does not require a certification by the responsible official, but it does need to be certified by the owner or operator. In addition, C.9(e) has been revised to reflect the correct rule cite. IDEM, OAQ has revised C.19 Actions Related to Noncompliance Demonstrated by a Stack Test; a certification by the responsible official is required for the notification sent in response to non-compliance with a stack test.

C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-41, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

C.19 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take

appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do ~~not~~ require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

16. The following was added to C.11 Compliance Requirements to state what OAQ does when stack testing, monitoring, or reporting is required to assure compliance with applicable requirements:

C.11 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements **by issuing an order under 326 IAC 2-1.1-11**. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

17. The IDEM, OAQ has restructured C.18 to clarify the content and implementation of the compliance response plan. The name of the condition has been changed to better reflect the contents of the condition. The language regarding the OAQ's discretion to excuse failure to perform monitoring under certain conditions has been deleted. The OAQ retains this discretion to excuse minor incidents of missing data; however, it is not necessary to state criteria regarding the exercise of that discretion in the permit. In (c)(2) "administrative amendment" has been revised to "minor permit modification," because 326 IAC 2-7-11(a)(7) has been repealed. Requests that do not involve significant changes to monitoring, reporting, or record keeping requirements may now be approved as minor permit modifications.

C.18 Compliance ~~Monitoring~~ **Response Plan - Failure to Take Response Steps Preparation, Implementation, Records, and Reports** [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to **prepare** ~~implement: a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:~~

(1) ~~This condition;~~

(2) ~~The Compliance Determination Requirements in Section D of this permit;~~

- ~~(3) The Compliance Monitoring Requirements in Section D of this permit;~~
- ~~(4) The Record Keeping and Reporting Requirements in Section G (General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and~~
- (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP's shall be submitted to IDEM, OAQ upon request ~~and shall be subject to review and approval by IDEM, OAQ.~~ The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, ~~and~~ maintained on site, and ~~is~~ comprised of:
- ~~(A)(1)~~ Reasonable response steps that may be implemented in the event that compliance-related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; **and an expected time frame for taking reasonable response steps.**
- ~~(B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.~~
- (2) **If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.**
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition **as follows:** ~~Failure to take reasonable response steps may constitute a violation of the permit.~~
- (1) **Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or**
- (2) **If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.**
- (3) **If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.**

- (4) Failure to take reasonable response steps shall constitute a violation of the permit.**
- (c) ~~Upon investigation of a compliance monitoring excursion, the~~ **The Permittee is excused from taking not required to take any** further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment **and This shall be an excuse from taking further response steps** providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for ~~an administrative amendment~~ **a minor permit modification** to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.**
- ~~(d)(e)~~ **(e)** Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. **The Permittee shall record all instances when response steps are taken.** In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- ~~(e)(f)~~ **(f)** **Except as otherwise provided by a rule or provided specifically in Section D,** all monitoring **as** required in Section D shall be performed **when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.** If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.
- (f)** ~~At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter. Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.~~
18. The requirement for weekly records of the cleaning cycle operations has been removed from D.2.8 (now re-numbered as D.2.9) and D.4.10 Record Keeping Requirements. This would be more appropriate in the PMP or CRP than in this condition.

D.2.89 Record Keeping Requirements

- (a) To document compliance with Condition D.2.5, the Permittee shall maintain the following:

- (1) ~~Weekly records of the inlet and outlet differential static pressure following operational parameters during normal operation when venting to the atmosphere:~~

~~(A) Inlet and outlet differential static pressure; and~~

~~(B) Cleaning cycle operation.~~

- (b) To document compliance with Condition D.2.6, the Permittee shall maintain records of the results of the inspections required under Condition D.2.6.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.4.10 Record Keeping Requirements

- (a) To document compliance with Conditions D.4.1 and D.4.2, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the PM emission limits established in Conditions D.4.1 and D.4.2.

(1) To document compliance with Conditions D.4.1 and D.4.2, the Permittee shall maintain records of ~~daily~~ visible emission notations of the grit blast rooms' stack exhaust as required by Condition D.4.6.

(2) To document compliance with Conditions D.4.1, D.4.2, and D.4.7- the Permittee shall maintain ~~the following weekly records of the inlet and outlet differential static pressure. following operational parameters during normal operation:~~

~~(A) Inlet and outlet differential static pressure; and~~

~~(B) Cleaning cycle: frequency and differential pressure.~~

- (b) To document compliance with Condition D.4.8, the Permittee shall maintain records of the results of the inspections required under Condition D.4.8.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

19. Condition D.1.2 is revised because the OAQ expresses limits in terms of "...tons per twelve (12) month period with compliance determined at the end of each month..." instead of "tons per 12 month rolling". Therefore, conditions have been revised to express limits in this manner. In addition, the original CP 089-7082-00332 issued on October 24, 1997, limited the three paint booths designated as 3a, 3b and 3c to 114.5 tons per year. This initial limit was based on 11/12ths of the actual limit. Therefore, this limit is revised to meet the full 12th/12th of the Emission Offset limit of 125.4 tons per year. After reviewing the history of the source, OAQ has determined that the 125.4 ton per year should not have been restricted to just the paints booths 3a, 3b, 3c but the entire source. The way the limit is written in CP 089-7082 does not keep the modification which added in the three paint booths below major modification levels. Therefore, the OAQ has determined that in order to avoid Emission Offset, the source needs a source wide limit of 125.4 tons per year.

In reviewing rule applicability, it has been determined that 326 IAC 8-1-6 does not apply to the 3 paint booths because the booths are already regulated by 326 IAC 8-2-9. In addition, these

booths did not have a < 25 ton per year limit pursuant to 326 IAC 2-3. The source's limit of 125.4 tons per year was based on the baseline actual emissions of 101.4 tons per year plus the limit on the modification of the three paint booths of 24.0 tons per year such that the modification stays below the Emission Offset thresholds. However, the paint application room located in D.6 of this permit does have a limit to avoid 326 IAC 2-3 as stated in CO089-2369-00332 issued March 25, 1995. In addition, this operation is not insignificant as stated in the draft permit and does have actual emissions greater than 15 pounds per day, therefore this operation is subject to 326 IAC 8-2-9. The paint application room listed in D.6 of this permit is moved to D.1 and the rule applicability of 326 IAC 2-3 and 8-2-9 are added to this section of the permit.

Facility Description [326 IAC 2-7-5(15)]:

Three (3) surface coating booths, identified as P-SC-01 (and 3a, 3b, and 3c), utilizing air assisted airless method of spraying and with a maximum capacity of 80 pounds of paint per hour and 0.75 steel tank cars per hour, using dry filters for over spray control, with three (3) natural gas drying room heaters with capacities of 3.45 each, and exhausting to two (2) exhaust ducts, ID 3:a1 and 3:a2, (constructed in 1978, replaced in 1997)

The paint application room, located in building #8 which consists of building # 8 paint booth designated as P-SC-02, adhesive application designated as P-SC-03, stencil shop designated as P-SC-04, building #8 jacket prime designated as P-SC-05, and coatings development lab designated as P-SC-06.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

D.1.2 Emission Offset Limit [326 IAC 2-3] ~~[326 IAC 8-1-6]~~

Pursuant to CP089-7082-**00332** issued on October 24, 1997 **and revised through this Part 70 Operating permit, and 326 IAC 2-3**, the VOC input from the entire source shall be less ~~as stated in CP~~ than 125.4 tons of VOC per 12 consecutive month period **where compliance is determined at the end of each month. rolled on a monthly basis. This usage limit is required to limit the potential to emit of VOC to less than 100 tons per 12 consecutive month period.** Compliance with this limit ensures that 326 IAC 2-3 (Emission Offset) is not applicable.

~~Pursuant to CP089-7082 issued on October 24, 1997, and 326 IAC 2-3, the VOC from to the three (3) surface coating booths, identified as P-SC-01, shall be less than 25 ton per 12 consecutive month period rolled on a monthly basis. Compliance with this limit ensures that 326 IAC 2-3 (Emission Offset) and 326 IAC 8-1-6 are not applicable.~~

Pursuant to CP089-2369-00332, issued March 29, 1995 and revised through this Part 70 Operating permit, the input to the paint application room including clean-up solvents minus the amount disposed of off-site shall be limited to 24.5 tons per twelve (12) consecutive month period where compliance is determined at the end of each month. This usage limit is required to limit the potential to emit of VOC to less than 25 tons per 12 consecutive month period. Compliance with this limit ensures that 326 IAC 2-3 (Emission Offset) is not applicable.

20. To clarify that this condition not only makes 326 IAC 2-4.1 not applicable but also makes this source minor under 112(j) of the CAA. Therefore, this source will not be subject to Part 63, National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Source Categories, of Title 40 of the Code of Federal Regulations (CFR).

- D.1.3 Hazardous Air Pollutant (HAP) Limit [326 IAC 2-4.1]~~[40 CFR Part 63.50]~~**[326 IAC 20-1]**
Pursuant to CP089-7082 issued on October 24, 1997, ~~and 326 IAC 2-4.1~~, the HAP input from the three (3) paint booths **(identified as P-SC-01) combined** shall be less than 10 tons of a single HAP per 12 consecutive month period, and less than 25 tons of a combination of HAPs per 12 consecutive month period **where compliance is determined at the end of each month** ~~rolled on a monthly basis~~. **These usage limits are required to limit the potential to emit of a single HAP to less than 10 tons per 12 consecutive month period and a combination HAPs to less than 25 tons per 12 consecutive months period.** Compliance with ~~this these~~ limits ensures that 326 IAC 2-4.1 (New Source Toxics Control Rule) **and 40 CFR part 63.50 (112(j) of the Clean Air Act (CAA))** ~~is are~~ not applicable.
21. Condition D.1.4 is revised to reflect the addition of the paint application room to Section D.1 of the permit.
- D.1.4 Particulate Matter (PM) Limit [326 IAC 6-1-2]
Pursuant to 326 IAC 6-1-2, the allowable particulate emissions for the spray coating operations **designated as P-SC-01, the building # 8 paint booth application room,** shall not exceed 0.03 grains per dry standard cubic feet of air per minute.
22. To more accurately describe how to determine compliance with a VOC usage or content limit, D.1.6 is revised as follows:
- D.1.6 Volatile Organic Compounds (VOC)**[326 IAC 8-1-2][326 IAC 8-1-4]**
Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) and 326 IAC 8-1-2(a)(7) ~~using formulation data supplied by the coating manufacturer.~~ **by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.**
23. Conditions D.1.9 and D.1.10 are revised to the reflect the addition of the paint application room to Section D.1.
- D.1.9 Particulate Matter (PM)
The dry filters for PM control shall be in place at all times when any one of the three (3) paint booths **designated as P-SC-01 (3a, 3b, or 3c) and the building # 8 paint application room,** ~~is are~~ in operation.
- D.1.10 Monitoring
(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks, S-SC-01 **and the paint application room stack(s),** while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - ~~Compliance Monitoring Plan - Failure to Take Response Steps,~~ **Compliance Response Plan - Preparation, Implementation, Records, and Reports** shall be considered a violation of this permit.

- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - ~~Compliance Monitoring Plan - Failure to Take Response Steps~~ **Compliance Response Plan - Preparation, Implementation, Records, and Reports**, shall be considered a violation of this permit.
 - (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.
24. Condition D.1.11 is revised to more accurately reflect the type of record keeping requirements required.

D.1.11 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1, D.1.2, **and** D.1.3, ~~and D.1.7~~, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC and HAP emission limits established in Condition D.1.1, D.1.2, and D.1.3.
 - (1) ~~The amount, and VOC and HAP, of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;~~
 - (2) ~~A log of the dates of use~~ **The amount of coating material and solvent less water used on daily basis.**
 - (A) **Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.**
 - (B) **Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;**
 - (3) The volume weighted VOC and HAP content of the coatings used for each month;
 - (4) The cleanup solvent usage for each month;
 - (5) The total VOC and HAP usage for each month; and
 - (6) The weight of VOCs and HAPs emitted for each compliance period.
- (b) To document compliance with Conditions ~~D.1.4 and~~ D.1.10, the Permittee shall maintain a log of weekly over spray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

25. The description listed in Section D.2 and A.2(b) and (c) is revised to more accurately describe the operations.

One (1) grit blast, identified as P-PB-01, **located in building #7**, with a maximum design rate of 14.4 tons per hour, using two dust collectors as control, and exhausting to two exhaust ducts, ~~ID-2-a & b~~; and

One (1) rotoblast, identified as P-PB-02, **located in building #7**, with a maximum design rate of 120 pounds per hour, using **a two (2)** dust collectors as control, and **each** exhausting to **one individual stacks**. ~~stack, ID-06.~~

26. On January 21, 2003 the EPA approved revisions to particulate matter (PM) emissions regulations for Union Tank Car's railcar manufacturing facility located in Lake County, Indiana. Therefore, the citation to this SIP not being final has been deleted from Condition D.2.1.

D.2.1 PM and PM10 Emission Limitations for Lake County [326 IAC 6-1-10.1]

Pursuant to the proposed rule, 326 IAC 6-1-10.1, **approved by the EPA on January 21, 2003** as of May 1, 1999, the date of public notice of the Development of Amendments to Rules Concerning Particulate Matter Emissions at Union Tank Car in the Indiana Register, the allowable PM emission rate from the grit blast and rotoblast operation, identified as P-PB-01 and P-PB-02, shall not exceed the allowable PM10 emission limit of 0.01 grains per dry standard cubic feet per minute which equates to 9.90 pounds per hour. ~~This rule is enforceable by the state, but is subject to comment and approval by EPA prior to federal enforceability. Federal enforceability is necessary to issue the final Title V permit.~~

27. Condition D.2.6. is revised to reflect that both blasting processes should have dust collector inspections.

D.2.6 Dust Collector Inspections

An inspection shall be performed each calendar quarter of all dust collectors controlling the blasting operations when venting to the atmosphere. A dust collector inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.

28. A new condition requiring visible emission notations for the rotoblast operation has been added. This condition has been added to assure compliance with 326 IAC 6 and 326 IAC 5 in addition to the parametric monitoring already listed. Visible emissions notations are not required for the grit blast operation because this operation vents inside the building. In addition, D.2.9 is revised to account for the record keeping of the visible emission for the rotoblast and grit blast operations. The condition following has been re-numbered accordingly.

D.2.8 Visible Emissions Notations

- (a) **Visible emission notations of the rotoblast exhaust points shall be performed once per shift during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.**
- (b) **For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the**

process is in operation, not counting startup or shut down time.

- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.**
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.**
- (e) The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.**

D.2.9 Record Keeping Requirements

- (a) To document compliance with Condition D.2.5, the Permittee shall maintain the following:
 - (1) records of the inlet and outlet differential static pressure during normal operation when venting to the atmosphere.
- (b) To document compliance with Condition D.2.6, the Permittee shall maintain records of the results of the inspections required under Condition D.2.6.
- (c) To document compliance with Condition D.2.8, the Permittee shall maintain records of visible emission notations of the rotoblast operation.**
- (de) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

29. The description in Section A.2(d) is revised to reflect the correct heat input capacity of the stress furnace designated as P-CB-03.

- (d) two (2) natural gas stress furnaces, P-CB-02 and P-CB-03, ~~each~~ with a maximum capacity of 55 MM Btu/hr **and 64.6 MM Btu/hr**, and exhausting through stacks, ID 5b and 5a, respectively, P-CB-02, (constructed in 1969), and P-CB-03, (constructed in 1969 and modified in 1993)

30. The natural gas certification reporting requirements have been deleted from the permit because the OAQ has determined that certification is not necessary for units that burn natural gas only. If they source intends to add alternative fuels to burn, the source would need prior OAQ approval.

~~D.3.3 Reporting Requirements~~

~~The natural gas certification form will document that any emission limitations or compliance monitoring requirements are not applicable. The certification form shall be submitted quarterly to the address listed in Section C - General Reporting Requirements of this permit.~~

31. The description listed in D.4 and A.2(e) are revised to reflect the correct description.

Two (2) grit blast operations **located in building #8, designated as** P-PB-03 and P-PB-04, each **operation** with a baghouse for control.

- (e) two (2) grit blast **operations located in building #8, designated as rooms, P-PB-03 and P-PB-04, each operation** with ~~one (1) a~~ baghouse for control, (constructed in 1989 and modified in 1995), and

32. Condition D.4.1 is revised to more accurately reflect when compliance is determined and the respective rules that the limits avoid.

D.4.1 PM and PM10 Emission Limitations for Lake County [326 IAC 2-3][~~326 IAC 6-1-2~~][40 CFR 52.21][~~326 IAC 2-2~~]

Pursuant to CP 089-2369, issued March 29, 1995, and 326 IAC 2-3, PM10 and PM allowable emissions for two (2) grit blast rooms, P-PB-03 and P-PB-04, shall not exceed 15 tons of PM10 and 25 tons of PM per 12 consecutive month period **combined, where compliance is determined at the end of each month**, so that the requirements of 326 IAC 2-3 (Emission Offset), **326 IAC 2-2** and 40 CFR 52.21, do not apply. Compliance with the **PM** emissions limitations based on 326 IAC 6-1-2 of 0.03 grains per dry standard cubic foot is adequate to show compliance with this emission limitation. ~~PM10 and PM allowable emissions for two (2) grit blast operations, P-PB-03 and P-PB-04, pursuant to 326 IAC 2-3, the emissions shall together not exceed 15 tons of PM10 or 25 tons of PM per 12 consecutive month period, so that the requirements of 326 IAC 2-3 (Emission Offset), and 40 CFR 52, do not apply. Compliance with the emissions limitations based on 326 IAC 6-1-2 of 0.03 grains per dry standard cubic foot is adequate to show compliance with this emission limitation.~~

33. The header of Condition D.4.2 is revised to state PM and not PM10 since the rule is for particulate matter and not PM10 specifically.

D.4.2 PM10 Emission Limitations for Lake County [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2, the allowable particulate emissions for blasting, P-PB-03 or P-PB-04, shall not exceed 0.03 grains per dry standard cubic feet of air per minute.

34. Condition D.4.4 is revised to reflect both of the grit blast operations identifications.

D.4.4 Testing Requirements [326 IAC 2-7-6(1)]

During the period between 30 and 36 months after issuance of this permit, the Permittee shall perform PM and PM-10 testing for the **two (2) grit blast operations rooms (P-PB-03 and P-PB-04)** utilizing Methods 5 or 7 (40 CFR 60, Appendix A) for PM and Methods 201 or 201A and 202 (40 CFR 51, Appendix M) for PM-10, or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM-10 includes filterable and condensable PM.

35. Condition D.4.8 is revised to reflect that there are two grit blasting operations.

D.4.8 Baghouse Inspections

An inspection shall be performed each calendar quarter of all baghouses controlling the blasting operations when venting to the atmosphere. A dust collector inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.

36. Condition D.4.10 is revised to more accurately reflect the record keeping requirements.

D.4.10 Record Keeping Requirements

- (a) ~~To document compliance with Conditions D.4.1 and D.4.2, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the PM emission limits established in Conditions D.4.1 and D.4.2.~~
- (1) To document compliance with Conditions D.4.1 and D.4.2, the Permittee shall maintain records of visible emission notations of the grit blast rooms' stack exhaust as required by Condition D.4.6.
- (2b) To document compliance with Conditions D.4.1, D.4.2, and D.4.7, the Permittee shall maintain records of the inlet and outlet differential static pressure **during normal operation and when venting to the atmosphere.**
- (3c) To document compliance with Condition D.4.8, the Permittee shall maintain records of the results of the inspections required under Condition D.4.8.
- (4d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

37.

D.5.1 **PM and PM 10 Emission Limitations for Lake County [326 IAC 2-3][40 CFR Part 52.21](326 IAC 2-2)**

PM10 and PM allowable emissions for welding, P-WD-01, pursuant to 326 IAC 2-3, the emissions shall not exceed 15 tons of PM10 or 25 tons of PM per 12 consecutive month period **where compliance is determined at the end of each month** ~~rolled monthly~~, so that the requirements of 326 IAC 2-3 (Emission Offset), and 40 CFR 52.21 and 326 IAC 2-2, do not apply. Compliance with these emission limitations shall be determined by calculations based on usage rates and AP42 emission factors for MIG, SAW, and stick welding.

38. Condition D.5.4 is deleted from this permit because the welding operations vent inside the building. Therefore, visible emission notations are not technically feasible to perform. This condition and the record keeping citation are both deleted from the permit.

~~D.5.4 Visible Emissions Notations~~

- (a) ~~Visible emission notations of the welding stack exhaust shall be performed once per shift during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.~~
- (b) ~~For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.~~
- (c) ~~In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.~~
- (d) ~~A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.~~
- (e) The Preventive Maintenance Plan for this unit shall contain troubleshooting

~~contingency and corrective actions for when an abnormal emission is observed.~~

D.5.54 Record Keeping Requirements

(a) To document compliance with Conditions D.5.1, the Permittee shall maintain records of the amount and type of welding rod and stick used.

~~(b) To document compliance with Conditions D.5.2 and D.5.4, the Permittee shall maintain records of visible emission notations of the welding stack exhaust.~~

(e-b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

39. The description listed in Section D.6 for the grinding and machining is revised to correct a typographical error.

Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow less than 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations: (Z-bar blast, P-PB-05, and small parts blast, P-PB-06), subject to 326 IAC 6-1-2.

40. Since the paint application room consisting of building # 8 paint booth, P-SC-02, adhesive application, P-SC-03, stencil shop, P-SC-04, building #8 jacket prime, P-SC-05, coatings development lab, P-SC-06, has been moved to Section D.1 of the permit and is now not considered an insignificant activity, the description to these operations have been deleted from Section D.6 and A.3. Condition D.6.1 has been revised to reflect this deletion. In addition, the description of the paint application room has been added to A.2.

D.6.1 Particulate Matter Limit [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2,

~~(a) the allowable particulate emissions for spray coating operations, P-SC-02, P-SC-03, P-SC-04, P-SC-05, P-SC-06, grinding, P-PB-05 and P-PB-06, shall not exceed 0.03 grains per dry standard cubic feet of air per minute.~~

~~(b) the particulate matter content of all gaseous fuel fired steam generators shall not exceed 0.01 grains per dry standard cubic foot.~~

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

(h) **The paint application room, located in building #8 which consists of building # 8 paint booth designated as P-SC-02, adhesive application designated as P-SC-03, stencil shop designated as P-SC-04, building #8 jacket prime designated as P-SC-05, and coatings development lab designated as P-SC-06.**

41. The header listed in Condition D.6.2 is revised from 326 IAC 8-3-5 to 326 IAC 8-3-2.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name: Union Tank Car Co. - Plant 1
Source Location: 151st Street and Railroad Avenue, East Chicago, IN 46312
County: Lake
SIC Code: 3743
Operation Permit No.: T089-7732-00332
Permit Reviewer: Holly M. Stockrahm

The Office of Air Quality (OAQ) has reviewed a Part 70 permit application from Union Tank Car Company - Plant 1 relating to the operation of a steel railroad tank car manufacturing operation.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) three (3) surface coating booths, identified as P-SC-01 (and 3a, 3b, and 3c), utilizing air assisted airless method of spraying and with a maximum capacity of 80 pounds of paint per hour and 0.75 steel tank cars per hour, using dry filters for over spray control, with three (3) natural gas drying room heaters with capacities of 3.45 each, and exhausting to two (2) exhaust ducts, ID 3:a1 and 3:a2, (constructed in 1978, replaced in 1997),
- (b) one (1) grit blast, identified as P-PB-01, with a maximum design rate of 14.4 tons per hour, using two dust collectors as control, and exhausting to two stacks, ID 2:a & b, (constructed in 1969),
- (c) one (1) rotoblast, identified as P-PB-02, with a maximum design rate of 120 pounds per hour, using a dust collector as control, and exhausting to one stack, ID 06, (constructed in 1968 and replaced in 1994),
- (d) two (2) natural gas stress furnaces, P-CB-02 and P-CB-03, each with a maximum capacity of 55 MM Btu/hr, and exhausting through stacks, ID 5b and 5a, respectively, P-CB-02, (constructed in 1969), and P-CB-03, (constructed in 1969 and modified in 1993),
- (e) two (2) grit blast rooms, P-PB-03, with one (1) baghouse for control, (constructed in 1989 and modified in 1995), and
- (f) one (1) steel grit abrasive blast system, P-PB-04, with a design rate of 7519.8 pounds per hour, using a baghouse as control, and exhausted to emission point 19, (constructed in 1989).

Unpermitted Emission Units and Pollution Control Equipment

The source also consists of the following unpermitted facilities/units:

- (a) Welding operations, P-WD-01, subject to 326 IAC 6-1-2, (constructed in 1989):
 - (1) metal inert gas (MIG) welders with welding rod usage of 270.98 pounds per hour,
 - (2) submerged arc welding with welding rod usage of 484.2 pounds per hour, and

- (3) stick welding with stick usage of 89.1 pounds per hour.

Note: Based on the calculations on page 5 of 10 of this TSD, these welding operations are not insignificant activities.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour, specified as follows:
 - (1) Three (3) heaters connected to surface coating booths, P-SC-01a, b, and c, with a maximum capacity of 1.15 MM Btu/hr each,
 - (2) three (3) drying room catalytic infra-red heaters, with a maximum capacity of 2.988 each,
 - (3) one (1) normalizing furnace, P-CB-01,
 - (4) one (1) boiler, No. 4, with a maximum capacity of 6.28 MM Btu/hr, constructed , subject to 326 IAC 6-1-2,
 - (5) one (1) boiler, No. 8, with a maximum capacity 2.06 MM Btu/hr, constructed , subject to 326 IAC 6-1-2,
 - (6) three (3) paint drying room heaters, P-CB-04 - P-CB-06, with a maximum capacity of 3.45 MM Btu/hr each,
 - (7) one (1) boiler, P-CB-08, subject to 326 IAC 6-1-2,
 - (8) one (1) pyrolysis furnace, P-CB-09,
 - (9) one (1) paint booth heater, P-CB-15, located in building No. 8,
 - (10) two (2) boilers, subject to 326 IAC 6-1-2, and nine (9) space heaters, P-CB-16 through P-CB-24,
 - (11) one (1) stress relieving furnace, No. 5902, with a maximum capacity of 9.6 MM Btu/hr.
- (b) a gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity of less than or equal to 10,500 gallons, (1,000 gallon AST, P-VL-01).
- (c) a petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month, (1,000 gallon AST, P-VL-02).
- (d) degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, subject to 326 IAC 8-3-5 and 326 IAC 8-3-2.
- (e) activities associated with the treatment of wastewater streams with an oil and grease content of less than or equal to 1% by volume.
- (f) replacement or repair of electrostatic precipitators, bags in baghouses and filters in other

air filtration equipment.

- (g) grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow less than 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations: (Z-bar blast, P-PB-05, small parts blast, P-PB-06), subject to 326 IAC 6-1-2.
- (h) a laboratory as defined in 326 IAC 2-7-1(21)(D).
- (i) Other categories with emissions below insignificant thresholds:
 - (1) surface coating operations with potential VOC (non-HAP) emissions less than 3 pounds per hour and 15 pounds per day, (building # 8 paint booth, P-SC-02, constructed in 1989, adhesive application, P-SC-03, constructed in 1969, stencil shop, P-SC-04, constructed in 1972, building #8 jacket prime, P-SC-05, constructed in 1972, coatings development lab, P-SC-06), subject to 326 IAC 6-1-2, and
 - (2) fugitive emissions from paved roads and parking lots, unpaved roads and parking lots, material transfer, wind erosion from storage piles and exposed areas, material transportation areas, material processing facilities with capacity equal to or greater than ten (10) tons per hour, dust handling, any other facility or operation with a potential to emit fugitive particulate matter and not included in this subsection, subject to 326 IAC 6-4 and 6-5-1(b).

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) OP 45-10-93-0583, issued on March 27, 1990
- (b) OP 45-10-93-0586, issued on March 27, 1990,
- (c) R 089-3759-00332, issued on July 11, 1994,
- (d) OP 45-10-93-0585, issued on March 29, 1990, superseded by CP089-7082 issued on October 24, 1997,
- (e) OP 45-10-93-0584, issued on March 27, 1990,
- (f) R 089-3080-00332, issued on July 12, 1993,
- (g) CP 089-2369-00332, issued on March 29, 1995,
- (h) R 089-4139-00332, issued on April 25, 1995,
- (i) CP 089-7082, issued on October 24, 1997.

All conditions from previous approvals were incorporated into this Part 70 permit except the following:

- (a) Pursuant to 326 IAC 6-1-10.1, the allowable PM emission rate from the grit blast and rotoblast operation shall not exceed the allowable PM10 emission limit of 0.002 lbs/ton and 0.02 lb/hr.

This limit is not achievable or reasonable given the particulate matter control technology of either today or 20 years ago, when the SIP limit was developed. Therefore, the company has requested a revision to the SIP and has proposed the following:

Pursuant to the proposed rule, 326 IAC 6-1-10.1, as of May 1, 1999, the date of public notice of the Development of Amendments to Rules Concerning Particulate Matter Emissions at Union Tank Car in the Indiana Register, the allowable PM emission rate from the grit blast and rotoblast operation, identified as P-PB-01 and P-PB-02, shall not exceed the allowable PM10 emission limit of 0.01 grains per actual cubic feet per minute which equates to 10.03 pounds per hour. This rule is enforceable by the state, but is subject to comment and approval by EPA prior to federal enforceability. Federal enforceability is necessary to issue the final Title V permit.

Approval of the SIP revision is in the final stages at this time. EPA has reviewed supporting air modeling data and calculations, and found that this change will not impact ambient air quality in Lake County. Therefore, this revised limit shall be incorporated into the draft Title V operation permit, however, the permit shall not be issued until the SIP revision is promulgated.

- (b) The limits from CP 089-7082, issued on October 24, 1997, were developed using 11/12ths as an option for limiting PTE when the source wants a 12 month rolling limit. This approach allowed sources to use simpler recordkeeping and reporting when there was an adequate margin between expected maximum actual emissions and the relevant limit on potential to emit (PTE). This approach has not been well understood and has been controversial, and is no longer considered valid. Based on EPA guidance, the limits have been revised to :
- (1) **less than 125.4 tons of VOC per 12 consecutive month period rolled on a monthly basis for the entire source.** Originally, IDEM established a limit of 114.5 tons of VOC per year limit on the entire source calculated as a total limit of 125.4 tons/year * 11/12 and had chosen an averaging time of 12 consecutive month period for record keeping.
 - (2) **less than 25 tons of VOC per 12 consecutive month period rolled on a monthly basis for the three (3) paint booths, identified as P-SC-01.** Originally, IDEM established a limit of 24.5 tons of VOC per year limit on three (3) paint booths. Based on EPA guidance, the potential to emit should be limited to less than the major source threshold for the specific pollutant, not a portion of that allowed, such as the 24.5 tons per year. This limit was established so that 326 IAC 8-1-6 (BACT) did not apply.
 - (3) **less than 10 tons per 12 consecutive month period of a single HAP, and less than 25 tons per 12 consecutive month period rolled on a monthly basis of a combination of HAPs for the three (3) paint booths, identified as P-SC-01.** Originally, IDEM established a HAPs limit of 8.25 tons per year of a single HAP, and 22 tons per year of combined HAPs, based on 11/12 * 10 and 11/12 * 25.
- (c) **less than 15 tons of PM10 or 25 tons of PM per 12 consecutive month period rolled monthly for P-PB-03 and P-PB-04.** The original limit for PM10 specified in CP 089-2369, issued on March 29, 1995, was an hourly limit of 3.4 lb/hr which equates to 14.9 tons per year (to make Emission Offset not applicable). The threshold for Emission Offset for PM10 is 15 tons per year, which does not specify an hourly limit.
- (d) The following condition from CP 089-7082, issued on October 24, 1997, limits PM10 emissions that total only 0.9 tons per year. The total PTE for CP 089-7082 was only 3.9 tons per year. It is unnecessary limit the PTE in this fashion when the threshold level of concern is 15 tons of PM10 per year. Therefore, the condition has been deleted as follows:

~~PM10 allowable emissions for the three (3) natural gas fired drying room heaters, and the three (3) natural gas fired catalytic infra-red heaters shall be less than 0.04 lb/hr each, or 0.24 lb/hr for all, so that the requirements of 326 IAC 2-3 (Emission Offset), and 40 CFR 52, do not apply.~~

Enforcement Issue

- (a) IDEM is aware that the following equipment has been operated prior to receipt of the construction permit.
 - (1) Welding operations, P-WD-01:
 - (A) metal inert gas (MIG) welders with welding rod usage of 270.98 pound per hour,
 - (B) submerged arc welding with welding rod usage of 484.2 pounds per hour, and
 - (C) stick welding with stick usage of 89.1 pounds per hour.
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the 326 IAC 2, Permit Review Rules. All applicable rules and limitations are outlined under the "State Rule Applicability" section.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively incomplete Part 70 permit application for the purposes of this review was received on December 16, 1996. Additional information received on January 27, 1997, made the Part 70 permit application administratively complete. A Notice of Administrative Completeness letter mailed to the source on February 3, 1997. Additional information was received from the source on January 16, 1998, April 14, 1998 and June 24, 1999.

Emission Calculations

- (a) The allowable emissions pursuant to 326 IAC 6-1-10.1, for one (1) grit blast and one (1) rotoblast, P-PB-01 and P-PB-02, pursuant to 326 IAC 6-1-10.1, shall be calculated as follows:
$$0.01 \text{ gr/acf/min} * 60 \text{ minutes/hr} * 1 \text{ lb/7000 grains} * 117,000 \text{ cf/min} = 10.03 \text{ lb/hr}$$

Testing is required for equipment with allowable PM emissions greater than 10 lb per hour.
- (b) PM10 and PM allowable emissions for two (2) grit blast operations, P-PB-03 and P-PB-04, pursuant to 326 IAC 2-3, the emissions shall together not exceed 15 tons of PM10 or 25 tons of PM per 12 consecutive month period, so that the requirements of 326 IAC 2-3 (Emission Offset), and 40 CFR 52, do not apply. This requirement also satisfies the requirements of 326 IAC 6-1-2. Testing is required for equipment with limits set in order to avoid Emission offset rule applicability.
- (c) Welding, P-WD-01, operations:
 - (1) Metal inert gas (MIG) (GMAW) emission factor for PM = PM10 is from AP 42 SCC 3-09-052-54:
$$271 \text{ lb rod/hr} * 5.2 \text{ lb PM10/1000 lb rod} = 1.4 \text{ lb PM10/hr} = 6 \text{ ton/yr}$$

- (2) Submerged arc welding (SAW) emission factor for PM = PM10 is from AP-42
 SCC 3-09-054-10:
 $484 \text{ lb rod/hr} \times 0.5 \text{ lb PM10/1000 lb rod} = 0.2 \text{ lb PM10/hr} = 1 \text{ ton/yr}$
- (3) Stick welding (FCAW) emission factor for PM = PM10 is from AP-42
 SCC 3-09-051-44:
 $89 \text{ lb stick/hr} \times 18 \text{ lb PM10/1000 lb stick} = 1.6 \text{ lb PM10/hr} = 7 \text{ ton/yr}$

Welding Total Potential PM10 Emissions:

$6 \text{ ton/yr} + 1 \text{ ton/yr} + 7 \text{ ton/yr} = 14 \text{ ton/yr} = 3 \text{ lb/hr.}$

Testing is not required for this operation because the allowable is less than 10 lb/hr.

The allowable emissions for this operation, pursuant to 326 IAC 6-1-2, is 0.03 grains per dry standard cubic foot. The air flow is 12000 actual cubic feet per minute. Therefore, the allowable emissions are $0.03 \text{ gr/dscf} \times 12000 \text{ acf/min} \times 60 \text{ min/hr} \times 7000 \text{ lb/gr} = 3.08 \text{ lb/hr.}$ Therefore, the source is in compliance.

- (d) Pursuant to 326 IAC 6-1-2, allowable particulate emissions from natural gas fired boilers (insignificant activities) shall not exceed 0.01 gr/dscf.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	greater than 100
PM-10	greater than 100
SO ₂	less than 100
VOC	greater than 25
CO	less than 100
NO _x	greater than 100

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential Emissions (tons/year)
dibutylphthalate	greater than 10
ethylbenzene	greater than 10
ethylene glycol	greater than 10
formaldehyde	greater than 10
hexamethylene-1,6-diisocyanate	less than 10
methanol	greater than 10
methyl ethyl ketone	greater than 10
methyl isobutyl ketone	greater than 10
4:4-methylenedianiline	greater than 10
phenol	greater than 10

toluene	greater than 10
trichloroethylene	greater than 10
xylene	greater than 10
glycol ethers	greater than 10
TOTAL	greater than 25

- (a) The potential emissions (as defined in the Indiana Rule) of PM₁₀ and NO_x are equal to or greater than 100 tons per year, and VOC is equal to or greater than 25 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential emissions (as defined in Indiana Rule) of any single HAP is equal to or greater than ten (10) tons per year and the potential emissions (as defined in Indiana Rule) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions
 Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1998 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	3
PM-10	0.09
SO ₂	0.08
VOC	72
CO	0.6
NO _x	18

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 operating permit. The table below summarizes the total limited potential to emit of the significant emission units.

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
P-SC-01 through 04 total source				125.4 ¹			
P-SC-01				25 ²			10 of one, 25 of combined

P-PB-03		15 ³ of PM10, 25 of PM					
P-PB-04							
P-WD-01		15 ⁴ of PM10, 25 of PM					

¹Limit specified in CP 089-7082, issued on October 24, 1997. This total source limit has been revised to the appropriate yearly limit of 125.4 tons of VOC per year as discussed under the Existing Approvals section of this document. A limit on replacement booths P-SC-01 increase in input was limited to 25 tons of VOC per 12 consecutive month period so that the requirements of BACT do not apply.

² The potential to emit of HAPs, based on the VOC limit of 25 tons of VOC limit is calculated as follows:

$$\begin{aligned} \text{(1) Single HAP Emissions Limit} &= \frac{(\text{VOC limit, 25 ton/yr}) * (\text{Pot'l single HAP emission, 31.5 ton/yr})}{(\text{VOC pot'l emissions, 282.9 ton/yr})} \\ &= 2.8 \text{ ton/year} \end{aligned}$$

$$\begin{aligned} \text{(2) Combined HAP Emissions Limit} &= \frac{(\text{VOC limit, 25 ton/yr}) * (\text{Pot'l single HAP emission, 63.12 ton/yr})}{(\text{VOC pot'l emissions, 282.9 ton/yr})} \\ &= 5.6 \text{ ton/year} \end{aligned}$$

³ Limit for VOC specified in CP 089-2369, issued on March 29, 1995, was to make Emission Offset not applicable.

⁴ Limit for PM10 specified in CP 089-4139, issued on April 25, 1995, was to make Emission Offset not applicable.

County Attainment Status

The source is located in Lake County.

Pollutant	Status
PM-10	non-attainment
SO ₂	non-attainment
NO ₂	unclassifiable
Ozone	non-attainment
CO	non-attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Lake County has been designated as nonattainment for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.
- (b) Lake County has been classified as nonattainment for PM10, SO₂, and CO. Therefore, these emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.
- (c) Fugitive Emissions
 Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

- (a) The boilers are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60, Subpart Dc), because the size of the units (each is less than 10 MM Btu/hr), and the two (2) stress furnaces, although 55 MM Btu/hr each, are not subject because they are not boilers. No other New Source Performance Standards apply.
- (b) The degreaser is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart T, because halogenated solvent is not used. No other NESHAPs apply.

State Rule Applicability - Entire Source

326 IAC 2-3 (Emission Offset)

- (a) Pursuant to 326 IAC 2-3, PM10 and PM allowable emissions for welding, P-WD-01, the emissions shall not exceed 15 tons of PM10 and 25 tons of PM per 12 consecutive month period rolled monthly, so that the requirements of 326 IAC 2-3 (Emission Offset), and 40 CFR 52, do not apply. Compliance with these emission limitations shall be determined by calculations based on usage rates and AP42 emission factors for MIG, SAW, and stick welding.
- (b) Pursuant to CP 089-2369, issued March 29, 1995, and 326 IAC 2-3, PM10 and PM allowable emissions for two (2) grit blast rooms, P-PB-03 and P-PB-04, shall not exceed 15 tons of PM10 and 25 tons of PM per 12 consecutive month period, so that the requirements of 326 IAC 2-3 (Emission Offset), and 40 CFR 52, do not apply. Compliance with the emissions limitations based on 326 IAC 6-1-2 of 0.03 grains per dry standard cubic foot is adequate to show compliance with this emission limitation.
- (c) Pursuant to CP 089-7082, issued on October 24, 1997, potential to emit of VOC for the entire source shall not exceed 125.4 tons VOC per 12 consecutive month period rolled monthly, so that the requirements of 326 IAC 2-3 (Emission Offset), and 40 CFR 52, do not apply.
- (d) Pursuant to CP 089-7082, issued on October 24, 1997, potential to emit of VOC for the three (3) paint booths, identified as P-SC-01, shall not exceed 25 tons VOC per 12 consecutive month period rolled monthly, so that the requirements of 326 IAC 2-3 (Emission Offset), and 40 CFR 52, do not apply.
- (e) Pursuant to CP 089-7082, issued on October 24, 1997, PM10 allowable emissions for the three (3) natural gas fired drying room heaters, and the three (3) natural gas fired catalytic infra-red heaters shall be less than 0.04 lb/hr each, or 0.24 lb/hr for all, so that the requirements of 326 IAC 2-3 (Emission Offset), and 40 CFR 52, do not apply.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year (for Lake county) of VOC and NOx. Pursuant to this rule, the

owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of twenty percent (20%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 2-4.1(New Source Toxics Control)

Pursuant to CP089-7082 issued on October 24, 1997, the HAP from the three (3) paint booths, P-SC-01, shall not exceed 10 tons per year based on a monthly rolling average for any individual HAP and 25 tons per year based on a monthly rolling for any combination of HAPs. Compliance with this limit ensures that 326 IAC 2-4.1 (New Source Toxics Control Rule previously designated as 326 IAC 3.4) is not applicable.

326 IAC 6-1-2 (Nonattainment Area Particulate Limitations)

Pursuant to 326 IAC 6-1-2,

- (a) the allowable particulate emissions for welding, P-WD-01, spray coating operations, P-SC-01 through 04, blasting, P-PB-03 and P-PB-04, grinding, P-PB-06, two (2) natural gas stress furnaces, P-CB-02 and P-CB-03, shall not exceed 0.03 grains per dry standard cubic feet of air per minute.
- (b) the particulate matter content of all gaseous fuel fired steam generators shall not exceed 0.01 grains per dry standard cubic foot.

326 IAC 6-1-10.1(Lake County PM10 Emissions Requirements)

Pursuant to the proposed rule, 326 IAC 6-1-10.1, as of May 1, 1999, the date of public notice of the Development of Amendments to Rules Concerning Particulate Matter Emissions at Union Tank Car in the Indiana Register, the allowable PM emission rate from the grit blast and rotoblast operation, identified as P-PB-01 and P-PB-02, shall not exceed the allowable PM10 emission limit of 0.01 grains per actual cubic feet per minute which equates to 10.03 pounds per hour. This rule is enforceable by the state, but is subject to comment and approval by EPA prior to federal enforceability. Federal enforceability is necessary to issue the final Title V permit.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the paint booths, P-SC-01 through 04, shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for extreme performance coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the source and calculations made, the paint operations are in compliance with this requirement.

326 IAC 8-3-2 (Cold Cleaner Degreaser)

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations) for cold cleaning operations constructed after January 1, 1980, the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

326 IAC 8-3-5 applies to the degreaser because existing facilities as of 1990 without remote solvent reservoirs located anywhere in Lake County must comply.

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) the solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) the solvent is agitated; or
 - (C) the solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if

the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):

- (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

326 IAC 7-1 (Sulfur Dioxide Emissions Limitations) does not apply to these facilities which do not have a potential to emit twenty-five tons per year or ten pounds per hour of sulfur dioxide.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

1. The compliance monitoring requirements applicable to the surface coating processes, P-SC-01, are as follows:
 - (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks, S-SC-01 through 04, while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
 - (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.
2. The compliance monitoring requirements applicable to the welding processes, P-WD-01, are as follows:
- (a) Visible emission notations of the blasting stack exhausts shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
 - (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
 - (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
 - (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
 - (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
3. The compliance monitoring requirements applicable to the blasting processes, P-PB-01 through P-PB-04, are as follows:
- (a) The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the blasting processes, at least once weekly when the blasting process is in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 3.0 and 6.0 inches of water or a range established during the latest stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of the above mentioned range for any one reading.
 - (b) The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

These monitoring conditions are necessary because the controls for the surface coating and blasting processes must operate properly to ensure compliance with 326 IAC 2-1-3.

Conclusion

The operation of this steel railroad tank car manufacturing operation shall be subject to the

conditions of the attached proposed **Part 70 Permit No. T089-7732-00332.**